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Via ECF and FEDERAL EXPRESS

September 6, 2019

The Honorable George B. Daniels
United States District Court
Southern District of New York
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street
New York, NY 10007

The Honorable Sarah Netburn
U.S. Magistrate Judge
United State District Court for the S.D.N.Y.
Thurgood Marshall U.S. Courthouse
40 Foley Square, Room 430
New York, NY 10007

Re: *In Re: Terrorist Attacks on September 11, 2001*
03 MDL 1570 (GBD) (SN)

Dear Judge Daniels and Magistrate Judge Netburn:

I write in response to this Court's endorsed order of September 3, 2019 (ECF No. 5044), on behalf of the *O'Neill* Plaintiffs' fifteen (15) actions pending against the Islamic Republic of Iran ("Iran").

Unlike the *Burnett* and *Ashton* plaintiffs, we did not directly utilize the amendment procedure, as we were not authorized to do so, under the Court's order relating to new actions against Iran.

Rather, for the twenty (20) new plaintiffs, we relied upon the language in the complaints that the personal representatives were filing suits as "Personal Representative" of the particular Estate "and on behalf of all survivors, and all legally entitled beneficiaries and families members" of the 9/11 decedent. *See* Order, E.C.F. No. 3435 (January 25, 2017) adopting PEC proposals contained in the PEC letter, ECF No. 3433. This was further discussed in the individual memoranda of law in support of the applications for judgments relating to those new plaintiffs. *See e.g.*, E.C.F. No. 4911 (August 20, 2019) (The Abel Plaintiffs' Memorandum of Law in Support of Motion for Partial Final Judgment II), p. 6.

In light of the foregoing, please advise if the Court desires a more detailed analysis of the role, if any, of the statutes of limitation.

We further incorporate the arguments raised by counsel for the *Burnett* and *Ashton* plaintiffs in their letter responses of this date.

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We do, of course, remain available for additional explanations and information that the Court may need.

Respectfully submitted,

Jerry S. Goldman, Esq.

cc: All MDL Counsel of Record (via ECF)